



COMMONWEALTH OF MASSACHUSETTS DEPARTMENT OF TELECOMMUNICATIONS AND CABLE

D.T.C. 21-2

December 13, 2021

Petition of Charter Fiberlink MA-CCO, LLC and Time Warner Cable Information Services (Massachusetts), LLC for Designation as an Eligible Telecommunications Carrier.

ORDER

I. INTRODUCTION

Charter Fiberlink MA-CCO, LLC (“Charter Fiberlink”) and Time Warner Cable Information Services (Massachusetts), LLC (“Time Warner”) (together, “Charter”) have requested that the Department of Telecommunications and Cable (“Department”) amend their respective service areas, which were defined in the Department’s Order Granting Petition which granted both petitioners Eligible Telecommunications Carrier (“ETC”) designation pursuant to 47 U.S.C. § 214(e)(4). *Petition of Charter Fiberlink & Time Warner to Amend their Respective ETC Designated Serv. Areas*, D.T.C. 21-2 (Oct. 29, 2021) (“Charter Service Area Petition”). The Department grants both Charter Fiberlink’s and Time Warner’s requests for the reasons set forth below.

II. PROCEDURAL HISTORY

On January 6, 2021, Charter Fiberlink and Time Warner filed a joint petition seeking designation as ETCs. *Joint Application of Charter Fiberlink & Time Warner for Designation as ETCs to Receive Rural Digital Opportunity Fund Auction (Auction 904) Support for Voice & Broadband Servs. & Request for Expedited Review* (Jan. 6, 2021) (“Charter Petition”). On June

4, 2021, the Department designated Charter Fiberlink and Time Warner as ETCs in limited geographical service areas for purposes of receiving funds that were provisionally awarded to Charter through the Federal Communications Commission’s (“FCC”) Rural Digital Opportunity Fund Auction (“RDOF Auction”). *Petition of Charter Fiberlink & Time Warner for Designation as an ETC*, D.T.C. 21-2, *Order Approving Petition* (June 4, 2021) (“Order”). Specifically, the Department designated Charter Fiberlink as an ETC so that it could receive high-cost funds in order to build out a network offering voice and broadband services in unserved and underserved areas comprising 39 census blocks, which are located within the Town of Tolland (“Charter Fiberlink Service Area”). *Id.* at 25, Exh. A. The Department designated Time Warner as an ETC so that it could receive high-cost funds in order to build out a network offering voice and broadband services in unserved and underserved areas comprising 1,225 census blocks, which are located within the municipalities of Alford, Ashfield, Athol, Becket, Bernardston, Blandford, Charlemont, Chester, Chesterfield, Colrain, Cummington, Egremont, Erving, Florida, Goshen, Hancock, Hawley, Heath, Lanesborough, Leyden, Middlefield, Monroe, Monterey, Mount Washington, New Ashford, New Salem, Orange, Otis, Petersham, Plainfield, Rowe, Royalston, Russell, Sandisfield, Savoy, Shelburne, Shutesbury, Tolland, Tyringham, Warwick, Washington, Wendell, Westfield, Windsor, and Worthington, Massachusetts (“Time Warner Service Area”).¹ *Id.* at 25, Exh. B.

On May 11, 2021, Charter filed a Petition for Waiver with the FCC seeking “a limited waiver of its RDOF application and deployment obligations in Massachusetts.” *In re FCC Rural*

¹ CCO Holdings, LLC was the winning bidder for the census blocks in both the Charter Fiberlink Service Area and the Time Warner Service Area and later assigned each of these bids to either Charter Fiberlink or Time Warner, both of which are majority owned and wholly controlled subsidiaries of CCO Holdings, LLC. Charter Petition at 2, 3. Time Warner, the lead operating company, filed the long-form applications for both Charter Fiberlink and Time Warner. *See* FCC, Long-Form Applicants Spreadsheet (listing long-form applicants to RDOF Auction) (last visited May 27, 2021).

Digital Opportunity Fund, WC 10-90, *Petition for Waiver* (May 11, 2021) (“Original Petition for Waiver”). Charter corrected the Original Petition for Waiver by letter to the FCC on May 13, 2021. Letter from Maureen O’Connell, Vice President, Regulatory Affairs, Charter, to Marlene Dortch, Sec’y, FCC (May 13, 2021) p. 4 (as corrected, “Petition for Waiver”). Through the Petition for Waiver, Charter sought relief from its RDOF obligations in either the Charter Fiberlink Service Area or the Time Warner Service Area with respect to 33 census block groups, and from some locations in two additional census block groups. *Id.* On July 26, 2021, the FCC stated that it “[did] not find good cause to grant” Charter’s request that Charter be relieved of its “obligation to apply for support for the census block groups at issue without being subject to the [FCC’s] default penalty framework.” *RDOF Bid Defaults Announced*, Public Notice, DA 21-910 (July 26, 2021) at 2 n.8 (“FCC Public Notice”).²

On October 29, 2021, Charter filed a petition with the Department requesting to amend the Charter Fiberlink Service Area and the Time Warner Service Area. Charter Service Area Petition at 1. Specifically, Charter petitioned to relinquish Time Warner’s ETC designation in 990 of the census blocks in the Time Warner Service Area, which are listed in Exhibit A attached hereto (“Time Warner Removed Census Blocks”), and to relinquish Charter Fiberlink’s ETC designation in all of the census blocks in the Charter Fiberlink Service Area (“Charter Fiberlink Removed Census Blocks”). *Id.* On November 3, 2021, the Department issued an Order of Notice which required Charter to publish a Notice, providing notice of the opportunity for hearing, in the Berkshire Eagle, the Springfield Republican, and the Greenfield Recorder by

² The FCC has not rendered a decision on Charter’s request to modify the number of locations for which Charter seeks support in two census block groups located in the Towns of Hawley, Charlemont, Monroe, and Rowe, Massachusetts. Original Petition for Waiver at 14; FCC Public Notice at 2 n.6. Charter is not seeking to relinquish its ETC designation in these census blocks. See Charter Service Area Petition at Exh. 2 (including these census blocks in Charter’s proposed service area going forward).

November 12, 2021, and to provide the Department with proof of publication by November 26, 2021. *See Petition of Charter Fiberlink & Time Warner for Designation as an ETC*, D.T.C. 21-2, *Order of Notice* (Nov. 3, 2021). On November 23, 2021, Charter filed proof of publication in the Berkshire Eagle, showing publication on November 6-7, 2021, in the Springfield Republican, showing publication on November 9, 2021, and in the Greenfield Recorder, showing publication on November 10, 2021. The Department hereby accepts Charter's Certificate of Publication of Notice. The Department received no requests for a hearing, no intervention requests, and no comments in this proceeding. Any right to a hearing in this matter is thus waived. *See G.L. c. 30A, § 10.*

III. ANALYSIS AND FINDINGS

A. Standard

An ETC must meet both federal and state requirements to relinquish its ETC designation in some or all of its service area.

1. Federal Requirements

Section 214(e)(4) provides the following:

A State commission . . . shall permit an [ETC] to relinquish its designation as such a carrier in any area served by more than one [ETC]. An [ETC] that seeks to relinquish its [ETC] designation for an area served by more than one [ETC] shall give advance notice to the State commission . . . of such relinquishment. Prior to permitting a telecommunications carrier designated as an [ETC] to cease providing universal service in an area served by more than one [ETC], the State commission . . . shall require the remaining [ETC(s)] to ensure that all customers served by the relinquishing carrier will continue to be served, and shall require sufficient notice to permit the purchase or construction of adequate facilities by any remaining [ETC]. The State commission . . . shall establish a time, not to exceed one year after the State commission . . . approves such relinquishment under this paragraph, within which such purchase or construction shall be completed.

47 U.S.C. § 214(e)(4); *see also* 47 C.F.R. § 54.205. Thus, for the Department to grant an ETC's petition to relinquish an ETC designation in a some or all of its service area: (1) there must be more than one ETC serving that portion of its service area; (2) the ETC must give the Department advance notice of its intent to relinquish its ETC designation; (3) the remaining ETC(s) in the service area must ensure that all of the relinquishing ETC's customers will continue to be served; and (4) to the extent that additional facilities are required to serve any of those customers, there must be sufficient notice to allow the remaining ETC(s) to construct or purchase those additional facilities.

2. State Requirements

An ETC that plans to cease offering Lifeline service in Massachusetts must, at a minimum, (1) notify its Lifeline customers and the Department 60 days in advance of the ETC's planned discontinuance of Lifeline service in all or part of Massachusetts and (2) work in good faith with its Lifeline customers and the Department to facilitate smooth transition of customers to alternative ETCs of the customers' choice ("13-4 Requirements"). *Investigation by the Dep't on its Own Motion into the Implementation in Mass. of the Fed. Commc'n's Comm'n's Order Reforming the Lifeline Program*, D.T.C. 13-4, *Order Implementing Requirements & Further Request for Comment* (Aug. 1, 2014) at 21, Appendix ("13-4 Order Implementing Requirements").

B. Analysis

Time Warner and Charter Fiberlink have met the federal standard for relinquishment of an ETC designation and have satisfied the Department's requirements for discontinuance of Lifeline service in Massachusetts.

1. Time Warner

The Department finds that Time Warner has met both the federal and state requirements to amend the Time Warner Service Area by relinquishing its ETC designation under 47 U.S.C. § 214(e)(4) in the Time Warner Removed Census Blocks. 47 U.S.C. § 214(e)(4); 13-4 Order Implementing Requirements at 21, Appendix.

a. Federal Requirements

First, the Time Warner Removed Census Blocks are served by at least one other ETC. See 47 U.S.C. § 214(e)(4); Charter Service Area Petition at 4. Those located in the Town of Hancock are served either by Verizon New England Inc. d/b/a Verizon Massachusetts (“Verizon”) or by Taconic Telephone Corp. d/b/a Consolidated Communications (“Taconic”), both of which are ETCs. *Investigation by the Dep’t of Telecomms. & Energy on its own motion concerning (1) designation of eligible telecomms. carriers, pursuant to § 102 of the Telecomms. Act of 1996 (“Act”); (2) participation in the FCC’s modified Lifeline program & acceptance of increased fed. funding, pursuant to 47 C.F.R. §§ 54.400-54.417 et seq.; & (3) participation in the FCC’s program for discounted intrastate rates for telecomms. servs. for rural health care providers, pursuant to § 254(h) of the Act*, D.T.E. 97-103, Order at 7 (Dec. 23, 1997) (“D.T.E. 97-103 Order”) (designating Verizon, then New England Telephone and Telegraph Company d/b/a Bell Atlantic-Massachusetts, and Taconic ETCs in their study areas); *In re Connect Am. Fund, Rep. & Order*, DA 12-1777, ¶ 1 n.1 (rel. Nov. 6, 2012) (“[a] ‘study area’ is the geographic area served by an incumbent local exchange carrier (LEC) within a state and consists of one or more exchanges”); New England Tel. and Telegraph Co. D.P.U. Tariff No. 10, Part II, Local Section 2, Sheet 158, (May 2, 1973) and Sheet 204 (Sept. 2, 1966) (showing that Hancock is divided between the Pittsfield and Williamstown Exchanges, on the one hand, to which Verizon

provides local exchange service, and the remainder, to which Taconic provides local exchange service). The remainder of the Time Warner Removed Census Blocks are located in municipalities served entirely by Verizon.³ Therefore, all of the census blocks from which Time Warner seeks to relinquish its ETC status are served by at least one other ETC.

Second, Time Warner gave the Department advance notice of its intent to relinquish its ETC designation in the Time Warner Census Blocks. *See* 47 U.S.C. § 214(e)(4); Charter Service Area Petition. Charter first notified the Department that it would likely seek to amend its service area in the Charter Petition, filed on January 6, 2021. Charter then filed the Charter Service Area Petition on October 29, 2021. Further, Time Warner has not yet begun to operate as an ETC, as it has not yet built out its network in the service area. *See* Charter Service Area Petition at 4. The Department finds that Charter's notice is sufficient.

Third, the requirement that Time Warner's customers "will continue to be served" upon Time Warner's relinquishment of its ETC is met in this case because Charter states that Time Warner has not yet begun providing service in the Time Warner Removed Census Blocks and thus does not have any customers. 47 U.S.C. § 214(e)(4); Charter Service Area Petition at 4.

Fourth, for the same reason that Time Warner does not have any customers, additional facilities and notice to allow remaining ETC(s) to construct or purchase those additional facilities are not required in this case. *See* 47 U.S.C. § 214(e)(4); Charter Service Area Petition at 4.⁴

³ Outside of Hancock, Verizon provides local exchange service in all of Massachusetts except in the Towns of Gosnold, Richmond, and Granby, and none of the Time Warner Removed Census Blocks contain any portion of those three towns. *See, e.g., In re Global Connection Inc. of Am. d/b/a STAND UP WIRELESS*, D.T.C. 11-11, Order at 7-9 (Mar. 5, 2013) (holding that all of Massachusetts is served by Verizon, Granby Telephone and Telegraph Company, Inc. (which operates only in the Town of Granby), Richmond Telephone Company (which operates in only in the Town of Richmond), Sentinel Tree Telephone Company, Inc. (which operates only in the Town of Gosnold), and Taconic (which operates in Massachusetts only in the Town of Hancock)); Charter Service Area Petition at 4.

⁴ The Department therefore need not establish a time within which such purchase or construction shall be completed. *See* 47 U.S.C. § 214(e)(4).

As a result of the foregoing, the Department finds that Time Warner has met the federal standard for relinquishment of its ETC designation in the Time Warner Removed Census Blocks under 47 U.S.C. § 214(e)(4).

b. State Requirements

The Department finds that Time Warner has satisfied the 13-4 Requirements. As discussed above, Charter states that Time Warner does not yet have any Lifeline customers. Charter Service Area Petition at 4. Accordingly, Time Warner has no Lifeline customers to notify, and the Department determines that Time Warner has provided adequate notice to the Department of its planned ETC designation relinquishment in the Time Warner Removed Census Blocks. Furthermore, since Time Warner has no Lifeline subscribers, the Department need not address the requirement that Time Warner work in good faith with its Lifeline subscribers and the Department to facilitate smooth transition of such subscribers to alternative ETCs of the customers' choice.

The Department finds that Time Warner has met the Department's requirements for discontinuance of Lifeline service in Massachusetts.

2. Charter Fiberlink

The Department finds that Charter Fiberlink has met both the federal and state requirements to relinquish its ETC designation under 47 U.S.C. § 214(e)(4). 47 U.S.C. § 214(e)(4); 13-4 Order Implementing Requirements at 21, Appendix.

a. Federal Requirements

First, the Charter Fiberlink Removed Census Blocks are served by at least one other ETC. See 47 U.S.C. § 214(e)(4). The Charter Fiberlink Census Blocks are located in the Town of Tolland, all of which is served by Verizon, which is an ETC. See D.T.E. 97-103 Order; *supra*

note 3. Therefore, all census blocks from which Charter Fiberlink seeks to relinquish its ETC status are served by at least one other ETC.

Second, Charter Fiberlink gave the Department advance notice of its intent to relinquish its ETC designation. *See* 47 U.S.C. § 214(e)(4); Charter Service Area Petition. Charter first notified the Department that it would likely seek to amend its service area in the Charter Petition, filed on January 6, 2021. Charter then filed the Charter Service Area Petition on October 29, 2021. Further, Charter Fiberlink has not yet begun to operate as an ETC, as it has not yet built out its network in the service area. *See* Charter Service Area Petition at 4. The Department finds that Charter's notice is sufficient.

Third, the requirement that Charter Fiberlink's customers "will continue to be served" upon Charter Fiberlink's relinquishment of its ETC is met in this case because Charter states that Charter Fiberlink has not yet begun providing service in the Charter Fiberlink Removed Census Blocks and thus does not have any customers. 47 U.S.C. § 214(e)(4); Charter Service Area Petition at 4.

Fourth, for the same reason that Charter Fiberlink does not have any customers, additional facilities and notice to allow remaining ETC(s) to construct or purchase those additional facilities are not required in this case. *See* 47 U.S.C. § 214(e)(4); Charter Service Area Petition at 4.⁵

As a result of the foregoing, the Department finds that Charter Fiberlink has met the federal standard for relinquishment of its ETC designation under 47 U.S.C. § 214(e)(4).

⁵ The Department therefore need not establish a time within which such purchase or construction shall be completed. *See* 47 U.S.C. § 214(e)(4).

b. State Requirements

The Department finds that Charter Fiberlink has satisfied the 13-4 Requirements. As discussed above, Charter states that Charter Fiberlink does not yet have any Lifeline customers. Charter Service Area Petition at 4. Accordingly, Charter Fiberlink has no Lifeline customers to notify, and the Department determines that Charter Fiberlink has provided adequate notice to the Department of its planned ETC designation relinquishment. Furthermore, since Charter Fiberlink has no Lifeline subscribers, the Department need not address the requirement that Charter Fiberlink work in good faith with its Lifeline subscribers and the Department to facilitate smooth transition of such subscribers to alternative ETCs of the customers' choice.

The Department finds that Charter Fiberlink has met the Department's requirements for discontinuance of Lifeline service in Massachusetts.

IV. CONCLUSION

Both Time Warner and Charter Fiberlink have met the federal standard for relinquishment of an ETC designation and have satisfied the Department's requirements for discontinuance of Lifeline service in Massachusetts. Accordingly, the Department grants the Charter Service Area Petition. As a result of this Order, Time Warner's ETC service area will be comprised of the census blocks listed in Exhibit B attached hereto.

V. ORDER

After notice, opportunity for comment and a full and fair hearing, and consideration, it is hereby

ORDERED: that the Department GRANTS the Charter Service Area Petition to amend the Time Warner Service Area, effective December 13, 2021; and it is

FURTHER ORDERED: that the Department GRANTS the Charter Service Area Petition to relinquish Charter Fiberlink's ETC Designation in Massachusetts, effective December 13, 2021; and it is

FURTHER ORDERED: that Charter Fiberlink SHALL TRANSMIT a copy of this Order to the Universal Service Administrative Company; and it is

FURTHER ORDERED: that Time Warner SHALL TRANSMIT a copy of this Order to the Universal Service Administrative Company.

By Order of the Department:



Karen Charles Peterson
Karen Charles Peterson, Commissioner

RIGHT OF APPEAL

Pursuant to G.L. c. 25, § 5, and G.L. c. 166A, § 2, an appeal as to matters of law from any final decision, order or ruling of the Department may be taken to the Supreme Judicial Court for the County of Suffolk by an aggrieved party in interest by the filing of a written petition asking that the Order of the Department be modified or set aside in whole or in part. Such petition for appeal shall be filed with the Secretary of the Department within twenty (20) days after the date of service of the decision, order or ruling of the Department, or within such further time as the Department may allow upon request filed prior to the expiration of the twenty (20) days after the date of service of said decision, order or ruling. Within ten (10) days after such petition has been filed, the appealing party shall enter the appeal in the Supreme Judicial Court for the County of Suffolk by filing a copy thereof with the Clerk of said Court. Appeals of Department Orders on basic service tier cable rates, associated equipment, or whether a franchising authority has acted consistently with the federal Cable Act may also be brought pursuant to 47 C.F.R. § 76.944.

Exhibit A

Time Warner Relinquished Census Blocks

250158227001049	250158227001050	250158227001052	250158227001055	250158227001058
250158227001061	250158227001065	250158227001072	250158227001079	250158227001080
250158227001083	250158227002004	250158227002006	250158227002008	250158227002013
250158227002015	250158227002016	250158227002017	250158227002019	250158227002022
250158227002024	250158227002027	250158227002031	250158227002035	250158227002039
250158227002050	250158227002052	250158227002058	250158227002059	250158227002065
250158227002067	250158227002068	250158227002069	250158227002071	250158227002074
250158227002079	250158227002081	250158227002088	250158227002091	250158227002092
250158227002093	250158227002100	250158227002105	250158227003001	250158227003003
250158227003004	250158227003005	250158227003006	250158227003007	250158227003008
250158227003011	250158227003012	250158227003013	250158227003014	250158227003015
250158227003018	250158227003020	250158227003021	250158227003022	250158227003024
250158227003025	250158227003030	250158227003031	250158227003032	250158227003036
250158227003037	250158227003038	250158227003040	250158227003053	250158227003054
250158227003055	250158227003057	250158227003058	250158227003059	250158227003060
250158227003061	250158227003062	250158227003065	250158227003068	250158227003069
250158227003070	250158227003071	250158227003072	250158227003073	250158227003074
250158227003075	250158227003076	250158227003077	250158227003078	250158227003080
250158227003081	250158227003082	250158227003084	250158227003086	250158227003087
250158227003088	250158227003090	250158227003091	250158227003093	250158227003094
250158227003095	250158227003096	250158227003119	250158227003122	250158227003133
250277042002006	250277042002008	250277042002010	250277042002011	250277042002014
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250277042002035	250277042002036	250277042002037	250277042002038	250277042002039
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250277042002045	250277042002049	250277042002052	250277042002054	250277042002055
250277042002058	250277042002059	250277042002060	250277042002062	250277042002065
250277042002068	250277042002069	250277042002071	250277042002072	250277042002081
250277042002084	250277042002087	250277042002089	250277042002090	250277042002091
250277042002092	250277042002093	250277042002095	250277042002098	250277042002100
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250277042002113	250277042002114	250277042002132	250277042002133	250277042002135
250277042002136	250277042002137	250277042002141	250277042002147	250277042002148
250277042002153	250277042002155	250277042002156	250277042002157	250277042002158

Exhibit B
Time Warner Retained Census Blocks

250039111002009	250039111002014	250039111002016	250039111002017	250039111002025
250039111002032	250039111002035	250039111002037	250039111002043	250039313001000
250039313001001	250039313001002	250039313001004	250039313001005	250039313001014
250039313001017	250039313001018	250039313001019	250039313001026	250039313001051
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250039313002080	250039313002083	250039313002084	250039313002086	250039313002087
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250110401001038	250110401001052	250110401001056	250110401001058	250110401001062
250110401001064	250110401001067	250110401001070	250110401001072	250110401001073
250110401001088	250110401001092	250110401001094	250110401001096	250110401001097
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250110401001134	250110401001136	250110401001167	250110401001192	250110401004003
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250110401004057	250110401004059	250110401004069	250110401004072	250110401004073
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250110404001067	250110404001068	250110404001069	250110404001071	250110404001073
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250110404001100	250110404001101	250110404001102	250110404001107	250110404001110
250110404001113	250110404001114	250110404001129	250110404001132	250110404001133
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250277022002110	250277022002111	250277022002114	250277022002115	250277022002116
250277022002117	250277022002120	250277022002121	250277022002123	250277022002124
250277022002125	250277022002126	250277022002132	250277022002137	250277022002138
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250277022002147	250277022002148	250277022002149	250277022002158	250277022002170
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